



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

May 22, 2019

BY ECF

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Kaleil Isaza Tuzman and Omar Amanat  
S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

The Government writes to respectfully request an adjournment of the current May 24, 2019 date by which it must currently file its post-hearing submission in connection with the *Fatico* hearing held before Your Honor on April 1 and 2, 2019. While the Government has devoted considerable time to preparing its response to the defendants' post-hearing submissions, the Government requests the additional time so that we may fully consider and respond to the arguments advanced by the defendants in the nearly seventy pages of post-hearing briefing, and because both of the undersigned AUSAs are currently preparing for a June 3, 2019 securities fraud trial before Judge Failla that is expected to last four weeks. This is the Government's second request for an adjournment of this deadline. The Court previously granted our request to adjourn the initial May 10, 2019 deadline by two weeks, to May 24, 2019. We made that request on consent from defense counsel after counsel declined our request for a longer adjournment.

In light of the above, we request that our deadline be adjourned until July 12, 2019. We note that defendant Amanat is scheduled to appear before your Honor on July 25, 2019 for a *Fatico* hearing related to allegations of obstruction so the Government do not believe the requested adjournment will delay the date by which Amanat can be sentenced.

Respectfully submitted,

GEOFFREY S. BERMAN  
Acting United States Attorney

By: /s/  
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cc: Defense Counsel (via ECF)